

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 08-
v.	:	DATE FILED: January 30, 2008
GERARDO SANDOVAL	:	VIOLATIONS:
JESUS M. BELTRAN-DELRIO	:	21 U.S.C. § 846 (conspiracy to possess
CAMILO RODRIGUEZ	:	marijuana with intent to distribute - 1
	:	count)
	:	21 U.S.C. § 841(a)(1) (possession of
	:	marijuana with intent to distribute - 1
	:	count)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least on or about January 3, 2008, through on or about January 8, 2008,
in the Eastern District of Pennsylvania, defendants

**GERARDO SANDOVAL,
JESUS M. BELTRAN-DELRIO, and
CAMILO RODRIGUEZ**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute for remuneration 100 kilograms or more, that is, approximately 700 kilograms, of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B).

MANNER AND MEANS

It was part of the conspiracy that:

2. The defendants obtained control of more than 700 kilograms (1540 pounds) of marijuana in order to distribute that marijuana for profit.

3. Defendant GERARDO SANDOVAL supervised the transportation of marijuana from its storage location at a mushroom farm in Berks County, Pennsylvania, and arranged for the transportation of the marijuana by obtaining a covered trailer to transport part of the marijuana the defendants possessed.

4. Defendant CAMILO RODRIGUEZ arranged for transportation of the marijuana by obtaining a rental van to transport part of the marijuana the defendants possessed.

5. Defendants CAMILO RODRIGUEZ and JESUS M. BELTRAN-DELRIO oversaw the storage of the marijuana at a mushroom farm where they worked.

OVERT ACTS

In furtherance of the conspiracy, defendants committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about January 3, 2008, defendant CAMILO RODRIGUEZ rented a grey Ford 15-passenger van at a dealership in Temple, Pennsylvania.

2. On or about January 8, 2008, defendant GERARDO SANDOVAL purchased an enclosed trailer for \$2,650 in cash at a location in Leesport, Pennsylvania.

3. On or about January 8, 2008, between approximately 7:47 PM and approximately 8:12 PM, defendant GERARDO SANDOVAL made several telephone calls to defendant JESUS M. BELTRAN-DELRIO while both were in the vicinity of a mushroom farm in Maiden creek Township, Berks County, Pennsylvania.

4. On or about January 8, 2008, at approximately 7:50 PM, defendant JESUS M.

BELTRAN-DELRIO called defendant CAMILO RODRIGUEZ while both were in the vicinity of a mushroom farm in Maidencreek Township, Berks County, Pennsylvania.

5. On or about January 8, 2008, at approximately 8:14 PM, defendants JESUS M. BELTRAN-DELRIO and defendant CAMILO RODRIGUEZ possessed approximately 1566 pounds of marijuana at a mushroom farm in Maiden Creek Township, Berks County, Pennsylvania.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 8, 2008, in the Eastern District of Pennsylvania,
defendants

**GERARDO SANDOVAL,
JESUS M. BELTRAN-DELRIO, and
CAMILO RODRIGUEZ**

knowingly and intentionally possessed with intent to distribute for remuneration, and aided and abetted the possession with intent to distribute for remuneration of, 100 kilograms or more, that is, approximately 700 kilograms, of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B) and Title 18, United States Code, Section 2.

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**